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March 25, 2004

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VIA HAND DELIVERY

Hon Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Implementation of the Federal Communications Commission's
Triennial Review Order (Nine-month Proceeding)(Switching)*
Docket No. 03-00491

Dear Chairman Tate.

Enclosed are the original and fourteen copies of BellSouth's Second Supplemental Responses to AT&T's Second Set of Interrogatories. The Attachment to Item 113 is proprietary and is being submitted under separate cover pursuant to the Protective Order entered in this matter

Copies of the enclosed are being provided to counsel of record

Very truly yours,

Guy M Hicks

GMH ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY

In Re:)	
)	Docket No. 03-00491
IMPLEMENTATION OF THE FEDERAL)	
COMMUNICATIONS COMMISSION'S)	
TRIENNIAL REVIEW ORDER – 9)	Filed: March 25, 2004
MONTH PROCEEDING – SWITCHING)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S SECOND SUPPLEMENTAL
RESPONSES TO AT&T COMMUNICATIONS OF THE SOUTH CENTRAL, LLC'S
SECOND SET OF INTERROGATORIES**

Pursuant to the February 6, 2004 Order of the Tennessee Regulatory Authority ("Authority"), BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits its Second Supplemental Responses to the AT&T Communications of the South Central States, LLC's ("AT&T") Second Set of Interrogatories served on January 20, 2004.

REQUEST: Please indicate the number of "ported" residential telephone numbers to each CLEC, in each market listed in BellSouth Witness Pamela A. Tipton Direct Testimony Exhibit PAT-5. Please provide this information, if available, by month and by CLEC over the past 24 months or whatever time period Ms. Tipton relied on for her testimony.

RESPONSE: The information responsive to this Interrogatory is contained in the enclosed CD-ROM. These documents contain confidential information that is arguably protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR § 64.2007 and is being provided in response to the Authority's February 6, 2004 Order Granting AT&T's Motion to Require BellSouth To Respond To Discovery and is being filed subject to the terms of the parties' Protective Agreement and the Authority's Protective Order.

SUPPLEMENTAL RESPONSE:

In response to AT&T's request, additional responsive information to this Interrogatory is contained in the enclosed CD-ROM. This document contains confidential information that is arguably protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR § 64.2007 and is being provided in response to the Authority's February 6, 2004 Order Granting AT&T's Motion to Require BellSouth To Respond To Discovery and is being filed subject to the terms of the parties' Protective Agreement and the Authority's Protective Order. }

REQUEST: Please indicate the number of "extracted" business class loops to each CLEC, in each market listed in BellSouth Witness Pamela A. Tipton Direct Testimony Exhibit PAT-5. Please provide this information, if available, by month and by CLEC over the past 24 months or whatever time period Ms. Tipton relied on for her testimony.

RESPONSE: The information responsive to this Interrogatory is contained in the enclosed CD-ROM. These documents contain confidential information that is arguably protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR § 64.2007 and is being provided in response to the Authority's February 6, 2004 Order Granting AT&T's Motion to Require BellSouth To Respond To Discovery and is being filed subject to the terms of the parties' Protective Agreement and the Authority's Protective Order.

SUPPLEMENTAL RESPONSE:

See BellSouth's Second Supplemental Response to AT&T's Second Set of Interrogatories, Item No. 113.

REQUEST: Please provide all information "related to the actual deployment that exists in 7 of the 10 markets." Including at a minimum:

- a. The identify each of the switches claimed to be providing service to mass market customers, by owner, location and CLLI code;
- b. The number of mass market customers claimed to be served from each switch;
- c. The number of "ported" residential telephone numbers to each CLEC, in each market listed. Please provide this information, if available, by month, and by CLEC over the past 24 months.
- d. The number of "extracted" business class loop to each CLEC, in each market listed. Please provide this information, if available, by month and by CLEC over the past 24 months.
- e. For the last eighteen months, by month, by market, by wire center within the market, and by CLEC the number of:
 - i. 2W UNE loops;
 - ii. 4W UNE loops;
 - iii. DS1 UNE loops;
 - iv. DS3 UNE loops;
 - v. DS0 EELs;
 - vi. DS1 EELs;
 - vii. DS3 EELs,
 - viii. T-1 Special Access lines;
 - ix. DS3/T-3 Special Access lines;

provisioned to the CLECs listed in BellSouth Witness Pamela A. Tipton Direct Testimony Exhibit PAT-7.

RESPONSE: a. Of the CLECs BellSouth has identified as having actual deployment in markets where the triggers are not met, BellSouth is providing a list of switches these CLEC have identified as those they own and use to provide qualifying service in Tennessee. The information responsive to this Interrogatory is contained in the enclosed CD-ROM. These documents contain confidential information that is arguably protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR § 64.2007 and is being provided in response to the Authority's February 6, 2004 Order Granting AT&T's Motion to Require BellSouth

RESPONSE (CONT'D):

To Respond To Discovery and is being filed subject to the terms of the parties' Protective Agreement and the Authority's Protective Order.

- b. BellSouth states that Pamela Tipton's Direct Testimony in Tennessee does not discuss "the actual deployment that exists in 7 of the 10 markets." For purposes of this response, BellSouth assumes that AT&T is referring to Pamela Tipton's Direct Testimony at page 15, lines 9 and 10 which states "... one CLEC is serving mass-market customers using its' own switch in one of those markets."

BellSouth did not request that CLECs provide the number of mass-market customers served by each CLEC switch. BellSouth has made a conservative assumption that the switches identified by CLECs as providing qualifying service in Tennessee serve the general geographic area within which the switch resides.

- c. Please see BellSouth's Response to AT&T's Second Set of Interrogatories, Item No. 113.
- d. Please see BellSouth's Response to AT&T's Second Set of Interrogatories, Item No. 114.
- e. Please see BellSouth's Response to AT&T's Second Set of Interrogatories, Item No. 115.

SUPPLEMENTAL RESPONSE:

- b. The reference to Ms. Tipton's testimony previously provided in response to this request was incorrect. BellSouth states that Pamela Tipton's Direct Testimony in Tennessee does not discuss "the actual deployment that exists in 7 of the 10 markets." For purposes of this response, BellSouth assumes that AT&T is referring to Pamela Tipton's Direct Testimony at page 15, lines 8 and 9 which states "....CLECs are serving mass-market

SUPPLEMENTAL RESPONSE (CONT.):

customers using their own switches in two of those markets.”

BellSouth did not request that CLECs provide the number of mass-market customers served by each CLEC switch. BellSouth has made a conservative assumption that the switches identified by CLECs as providing qualifying service in Tennessee serve the general geographic area within which the switch resides.

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2004, a copy of the foregoing document was served on the parties of record, via the method indicated:

☐ Hand
☐ Mail
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☐ Overnight
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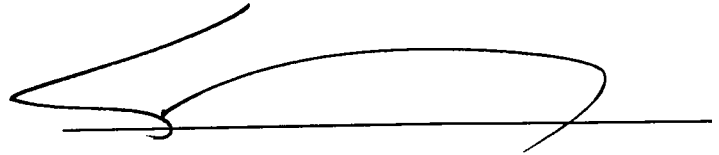
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A handwritten signature in black ink, appearing to be 'Ken Woods', written over a horizontal line.